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 AULUCK, R. Division of Licensing

SUBJECT: Comments on NUREG-0812, DES for facility.

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September 25, 1981



Dr. Rajender Auluck
Division of Licensing
Licensing Project Manager
U. S. Nuclear Regulatory Comm.
Washington, D. C. 20555

RE: COMMENT ON DES RELATED TO OPERATING LICENSE FOR WPPS-2, HANFORD, WASHINGTON
JULY 1981, NUREG-0812

Dear Dr. Auluck,

John F. Doherty, of 4327 Alconbury Lane, Suite #3, Houston, Texas 77021
comments as follows on the DES:

Comment 1

The DES, at Section 2.5 should indicate the record of unavailability of hydroelectric power in the region. One cannot tell if there is only a speculative value of infinitely small amount from the current area.

Comment 2

The DES, at Section 2.2 is deficient, because it does not state that there is any mechanism by which power may be shifted to California. What ~~should~~ be indicated is that there are agreements between WPPSS and California utilities to purchase power if such agreements exist.

Comment 3

The DES, at Page J-15, which is a reproduction of the 1972 Final Statement states the Wye burial site is "adjacent" to the plant site. NUREG-0812 is deficient in not covering the final status of the nuclear waste site adjacent to the proposed operating plant, particularly in regard to possible accidents, and particularly Class 9 Accidents. This of course would not be in the sense of site selection but rather if the burial site would pose or not pose unusual problems for the various accident event scenarios.

Comment 4

The Draft at Page 5-30, is unclear in its statement, "None (accidents) is known to have caused any radiation injury or fatality to any member of the public." The statement should include a statement of the ability to know if indeed the accidents caused a death or injury to any member of the public.

Comment 5

The Draft at Page 4-11, Section 4.3.6.1 should provide an explanation for why the population estimate within 10 miles of the site 786 persons too small. This would permit commentators to forecast the 40 year duration of plant operation and provide guidance for emergency planning. As current there is no explanation, which is a deficiency.

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Comment 6

On P. 5-30 of the Draft, the discussion of xenon and iodine release from the TMI-II accident is deficiently vague. It also appears to have omitted information from the report, "Assessment of Offsite Radiation Doses from the TMI-2 Accident," by Pickard, Lowe & Garick, consultants., (TDR-TMI 116, July 31, 1979). This report indicates 7 million curies were released in the first one and a half days of the accident, and used information on releases that occurred during the first three hours of the event unlike the Kemeny Commission Report (referenced) which reported the monitors at that time period could not give radiation release because they were off scale. Therefore a correction and recalculation should be made as to the effects of a much greater amount of radio-activity released, than a "few million curies of Xe 133" as in the text.

Thank you for the opportunity to comment on this Draft, I look forward to receiving the Final Statement.

Sincerely,

John F. Doherty, J.D.

John F. Doherty, J. D.
4327 Alconbury #3
Houston, Tx. 77021

